REMARKS/DISCUSSION OF THE ISSUES

Claims 1, 2, 4-6, 9, 11-13, 17-19 and 21-24 are pending in the application and have been rejected.

Claims 1, 2, 4-6, 9 and 21 are herein canceled. Claims 17 and 22 are amended.

The Rejections under 35 U.S.C. 102(e)

Claims 1-2, 9, 11-13, 17 and 21-24 have been rejected under 35 U.S.C. 102(e) as being anticipated by Walker, U.S. Patent No. 6,418,415 (hereinafter "Walker '415"). Claims 1-2, 4-6, 9 and 21 have been canceled. Claims 17 and 22 have been amended. For at least the reasons set forth below, it is respectfully submitted that the pending claims in this application are patentable over the applied art.

To properly establish a *prima facie* case of anticipation, *all* of the claimed elements must be found in the prior art. It follows, therefore, that if a *single* claimed element is not found in the prior art, a *prima facie* case of anticipation cannot properly be established.

Claim 11 has been rejected. Claim 11 contains the limitation "validating incoming data so as to ensure said data is valid". This limitation is not disclosed in or suggested by

Walker '415.

The Examiner states that the central controller 200 of Walker '415 receives an identifier of a general purpose account from which funds may be paid during step 1304. The Examiner states "This identifier of a general-purpose account is used to verify the buyer's financial transaction. It would not be possible for a buyer to transfer these funds unless relevant information was verified."

The central control processor merely **receives** an account number in this step. There is no validation of any information mentioned in Walker '415. The Examiner's viewpoint that it would be impossible to transfer funds without validation of data is simply not correct. Fraudulent transfers of funds occur all the time. For at least the reason that Walker '415 does not disclose validation of incoming data, claim 11 should be allowable. It is respectfully requested that the rejection of claim 11 be withdrawn.

As the rejection to claim 11 should be withdrawn, dependent claims 12 and 13 should also be allowable. Withdrawal of the rejection of claims 12 and 13 is respectfully requested.

Claim 17 has been rejected. Claim 17 has been amended to include the limitations of claim 21 and claim 21 has been canceled. Claim 17 contains the limitations of "determining if any attributes of said demands are missing" and "if said

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attributes are missing, automatically acquiring said attributes from another source". Neither of these steps is taught or suggested by Walker '415.

The Examiner states that Walker '415 teaches theses steps. The Examiner states that "If a CPO does not meet all criteria's (i.e. some relevant information is missing, Step 1318), the central controller will search the CPO database in order to locate the missing information (Step 1334)." The Examiner is mistaken.

First, step 1318 is merely the application of the aggregation rule. It is a determination of whether criteria are met -- **not** a determination of whether any attributes are actually missing. Walker '415 never actually **determines** if any attributes are missing, as required by the claim.

Moreover, if a CPO was missing attributes that caused the CPO to not meet all the criteria of the rule, the system of Walker '415 would **not** retrieve the missing information. Step 1334 is a search of a database to find "pending individual CPOs that are similar to the received CPO." Col. 14, lines 16-17. If there are similar CPOs, a new aggregate CPO including the received CPO and the similar CPOs is formed in step 1336. Col. 14, lines 18-29. So if a CPO was missing attributes, the system of Walker '415 would yield an aggregate CPO including CPOs that are **all** missing the attributes. Walker '415 never acquires the

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missing attributes from another source as required by the claim. As Walker '415 does not teach steps of claim 17, claim 17 should be allowable. Thus, withdrawal of the rejection of claim 17 is respectfully requested.

Claim 22 has been rejected. Claim 22 is amended for clarity. Claim 22 contains the limitations that if demands "meet criteria of a plurality of coalitions, proposing said plurality of coalitions to a user" and "permitting said user to assign said demands to a coalition of said plurality of coalitions". Walker '415 does not address the situation where a demand meets the criteria of a plurality of coalitions. When that occurs, according to this claim, the user would be presented with the coalitions to choose which one to join, rather than merely assigning the demand to a random coalition. As Walker '415 does not teach at least one element of claim 22, claim 22 should be allowable. Thus, withdrawal of the rejection to claim 22 is respectfully requested.

As the rejection to claim 22 should be withdrawn, dependent claim 23 should also be allowable. Withdrawal of the rejection of claim 23 is respectfully requested.

Claim 24 has been rejected. Walker '415 does not teach or suggest the claimed steps of determining if attributes are missing and if so, acquiring them from another source, as was discussed above with reference to amended claim 17. Thus, this

claim should be allowable and withdrawal of this rejection is respectfully requested.

The Rejections under 35 U.S.C. 103(a)

Claims 4-6 and 18-19 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Walker '415 in view of Official Notice. Claims 4-6 have been canceled.

Claims 18 and 19 are based upon claim 17, which is believed to be allowable. As claim 17 should be allowable, dependent claims 18 and 19 should also be allowable. Withdrawal of the rejection of claims 18 and 19 is respectfully requested.

In view of the above amendments and arguments, it is believed that this application is now in condition for allowance and such a notice is respectfully requested.

Respectfully submitted,

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